



DEPARTMENT OF HEALTH & HUMAN SERVICES

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Public Health Service

Agency for Toxic Substances
and Disease Registry
Atlanta GA 30333

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EPA REGION VIII
SUPERFUND BRANCH

Mr. Max Dodson
US EPA Region VIII
Mail Code 8EPR-SR
999 18th Street
Denver, Colorado 80202

Re: ATSDR comments on EPA's proposed plan for the VBI70 site

Dear Mr. Dodson:

The Agency for Toxic Substances and Disease Registry (ATSDR) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) proposed plan for the Vasquez Boulevard and I-70 site (VBI70). We understand that the preferred alternative (i.e., alternative 4) is a combination of continued soil sampling at properties that have not yet been sampled, soil removal at certain properties, and a community health program. Under this program, EPA will remove soil from properties with average arsenic levels above 128 ppm and average lead levels above 540 ppm. The community health program will involve health education, biological testing of children, and a response program to identify the source of lead or arsenic in order to stop exposure.

ATSDR is concerned that alternative #4 for the VBI70 site does not adequately protect children because some children will remain at risk for exposure to harmful effects from arsenic and lead in soil. A major drawback to alternative #4 is that a child who lives at a property with soil arsenic levels less than 128 ppm or soil lead levels less than 540 ppm must be tested and found to be exposed before soil removal action is taken. ATSDR has provided funds to the Colorado Department of Public Health and Environment (CDPHE) to conduct a health study into arsenic and lead exposure at the VBI70 site. While the results of this study can be useful in deciding future public health activities, the results cannot be used to determine if the proposed clean-up levels for arsenic (i.e., 128 ppm) and lead (i.e., 540 ppm) are protective.

Since the proposed clean-up levels do not protect children, a community health program should not be used in lieu of preventing exposure through environmental engineering controls. While a community health program can be an important element of the overall remedy for this site, the program needs to be implemented in conjunction with the appropriate clean-up levels.

The Agency is also concerned that the preferred clean-up level for lead at VBI70 is not consistent with lead clean-up levels at other sites in Region VIII. Therefore, ATSDR recommends that EPA re-evaluate the input parameters for the IEUBK lead model that were used for the VBI70 site. For example, comparison of the IEUBK parameters that were used at the Eureka Mills Site in Utah could be made.

Page 2 - Mr. Max Dodson

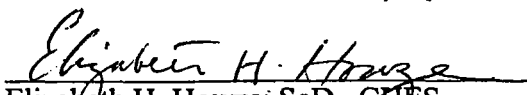
ATSDR encourages EPA to consider a new alternative, what we call alternative #6, which is described in detail in the attachment. Briefly, Alternative #6 will protect children from the dangers of arsenic and lead contamination by providing lower clean-up levels and will put in place a comprehensive community health program to reduce exposure while clean up is occurring. We also suggest that the design of the community health program should take place through a series of collaborative meetings of site-stake holders.


VBI70 residents have expressed concerns about environmental, social, and economic disparities that exist in their community. We would suggest that the development of an effective remedial and community health program at VBI70 will facilitate a better understanding and where possible development of mechanisms to potentially address some of the environmental justice concerns. To that end, ATSDR is very supportive of EPA's effort to expand the availability of CDPHE's lead poisoning prevention and the City of Denver's mitigation programs to the VBI70 communities. ATSDR is available to assist EPA, the State of Colorado, the City of Denver, and the VBI70 communities to try and augment these and potentially other important public health programs.

While ATSDR supports the concept of a community health program as part of an overall remedy for the site, such a program needs to be clearly delineated and its design phase should involve a collaborative effort with the community and government representatives participating in the VBI70 Working Group. Guaranteeing the continued involvement of all stakeholders is the only way to ensure a strong, long-term commitment to EPA's proposed multi-year community health program.

Thank you again for the opportunity to provide comments.

Sincerely,


Elizabeth H. Howze, ScD., CHES
Director
Division of Health Education
and Promotion


Robert C. Williams, P.E., DEE
Assistant Surgeon General
Director, Division of Health Assessment
and Consultation

Enclosure

cc:
Ms. Bonnie Lavelle
VBI70 Health Team Members
Dr. Henry Falk
ORO